



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CK/LXN
F.#2010R01079

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 9, 2012

By Federal Express & ECF

Joel S. Cohen, Esq.
128 Mott Street, Ste 706
New York, New York 10013

Re: United States v. Chang
Criminal Docket No. 11-0067 (S-1) (SJ)

Dear Mr. Cohen:

Enclosed please find one CD containing the government's continued discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The government hereby also requests reciprocal discovery.

The materials include:

- (a) Defendant's post-arrest statements (127254);
- (b) Personnel records relating to Danny Lau (127255-127289)
- (c) Notebooks found in offices associated with the defendant at St. John's University (124758-124883, 124884-125005 and 125006-125017);
- (d) Documents reflecting St. John's University policies (125039-125052, 125053-125054, 125055-125062);
- (e) Email subscriber information (124409-124411 and 124740-124745, 124746-124748, 124749-124757);

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- (f) Additional Citibank documents (125468-125642); and
- (g) Tax related documents (125643-127253), which were previously produced to the defendant as "Disk 4" on or about February 28, 2011.

If you have any questions or further requests, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
United States Attorney
Eastern District of New York

By: /s/
Charles Kleinberg
Lan Nguyen
Assistant U.S. Attorneys
(718) 254-6012/6162

Enclosures

CC: Clerk of Court (SJ) (w/o enclosures)